MCPO Exhibit 4.0(RH)

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois	:	
	:	
Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott, and Shelby, Illinois.	:	No. 12-0598

Surrebuttal Testimony on Rehearing of

Rudolph "Rudi" K. Reinecke

On behalf of

Moultrie County Property Owners

December 10, 2013

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Surrebuttal Testimony on Rehearing of Rudolph "Rudi" K. Reinecke

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Rudolph "Rudi" K. Reinecke. My business address is 2150 South Central Expressway; Suite 110, McKinney, Texas 75070. I am currently employed as Vice-President and Project Manager for Integrated Environmental Solutions, LLC ("IES").

Q ARE YOU THE SAME RUDOLPH "RUDI" K. REINECKE THAT FILED DIRECT TESTIMONY, REBUTTAL TESTIMONY, AND REBUTTAL TESTIMONY ON REHEARING IN THIS PROCEEDING?

A Yes, I am.

Q WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A The purpose of my surrebuttal testimony is to respond to Channon Family Trust (CFT) witness Ms. Burns rebuttal testimony on rehearing. I will specifically respond to Ms. Burns' statements on environmental impacts and benefits of paralleling existing transmission lines.

Q PLEASE SUMMARIZE THE NAMING CONVENTION YOU PRESENT IN THIS SURREBUTTAL TESTIMONY ON REHEARING.

A I am using the same naming convention as MCPO witness Mr. Dauphinais. Specifically, I respectively refer to the MCPO and CFT routes that use ATXI's Sulphur Spring Road site for Mt. Zion substation as Routes MZK and CFT. I respectively refer to the MCPO and CFT routes that use the ICC Staff Option #1 site for Mt. Zion substation as Routes MCPO-1 and CFT-1. Finally, I respectively refer to the MCPO and CFT routes that use the ICC Staff Option #2 site for Mt. Zion substation as Routes MZK-2 and CFT-2. These naming conventions are reflected in MCPO Exhibit 4.2(RH).

Q HAVE YOU REVIEWED MS. BURNS REBUTTAL TESTIMONY?

A Yes I have.

Q HOW DO YOU RESPOND TO MS. BURNS' STATEMENT THAT ANY PERCEIVED BENEFITS ACHIEVED BY PARALLELING ARE TOTALLY CANCELLED BY ALLEDGED "OFF-COARSE ROUTING"?

A I disagree. There are significant benefits derived from the fact that the MZK routes all parallel 14.7 miles of existing transmission lines, whereas the CFT alternatives only parallel one mile of existing transmission lines. The benefits are illustrated by the fact that the CFT route only minimally parallels existing transmission lines introducing new elements of adverse impacts; whereas, the MCPO route parallels more length of existing transmission lines where the elements have already been impacted. For example, there are social benefits associated with noise and visual effects and environmental benefits associated with following previously fragmented natural features. Generally, the residential and non-residential structures that are in close proximity to an existing transmission line are already subject to the noise and visual effects of the existing transmission line and therefore, are generally not affected to

the same degree by the addition of another transmission line that is routed in parallel with the existing transmission line. Fragmentation of natural features is another reason to route paralleling an existing transmission line; paralleling mitigates fragmentation of natural features. Many ecosystem processes[1] are adversely affected by the fragmentation of these natural features by the construction of a transmission line. By following an existing transmission line, the effects of fragmentation on these features along the MZK routes are minimized compared to the CFT routes which introduce new fragmentation.

Q HAVE YOU DOCUMENTED IMPACTS ASSOCIATED WITH PARALLELING EXISTING TRANSMSSION LINES?

Yes, I have quantified certain routing factors to document that there are already current impacts associated with paralleling 14.7 miles of existing transmission line to rebut Ms. Burns' statement that the perceived benefits achieved by paralleling are cancelled because the MZK route is "off course by 13.5 miles". MCPO Exhibit 4.1(RH) provides a land use summary and residential and non-residential structure counts for the route segments that parallel existing transmission lines. The amount of deciduous forest, open water, grassland, and structures presented in MCPO Exhibit 4.1(RH) shows the degree to which these routing factors already have been impacted by any existing transmission line. Currently 67 acres of deciduous forest, 1.3 acres of open water, and 10.5 acres of grassland are within the 500 foot corridor associated with the MZK routes. These acres are already impacted by the transmission line that is paralleled by MZK routes. Furthermore, there are 8 residential and 13 non-residential structures within 500 feet of the MZK routes that are already impacted by the existing transmission line. As I provided in MCPO Exhibit 2.2(RH), the MZK route from Sulphur Spring Road Substation has 16 residential and 51 non-residential

[1] Ecosystem processes are the interaction between all of the parts of the physical and biological components of the habitat

structures and the MZK from either Option 1 or 2 Substations have 12 residential and 57 non-residential structures within 500 feet of the line. Since these resources (deciduous forest, open water, grassland, and structures) are already impacted by the existing transmission line, the data presented in MCPO-Exhibit 2.2(RH) for the MZK Alternatives could be reduced by these previously impacted resources (i.e., 67 acres of deciduous forest, 1.3 acres of open water, 10.5 acres of grassland, 8 residential structures, and 13 non-residential structures).

Therefore, the number of newly affected residential structures along the MZK Alternatives will vary between 8 and 4 depending if the route starts at the Sulphur Spring Road Substation site or the Option 1/2 sites, respectively. On the other hand the CFT routes affect 35 to 31 new residential structures depending if the route starts at the Sulphur Spring Road Substation site or the Option 1/2 sites, respectively. Similarly, number of newly affected non-residential structures along the MZK Alternatives will vary between 38 and 44 depending if the route starts at the Sulphur Spring Road Substation site or the Option 1/2 sites, respectively. However, the CTF routes affect 139 to 129 new non-residential structures depending if the route starts at the Sulphur Spring Road Substation site or the Option 1/2 sites, respectively. The amount of impacts that a new transmission line will have on fragmenting woodlands along the MZK Alternatives will be between 44 and 64 acres versus the CFT Alternatives will fragment 143 to 164 acres of woodlands.

In summary, the MZK Alternatives significantly benefits from paralleling existing transmission line as it relates to visual, noise, and fragmentation. The MZK-1 and MZK-2 Alternatives have 27 fewer newly affected residential structures than the CFT-1 and CFT-2 routes and 116 fewer new non-residential structures than the CFT-1 and CFT-2 routes. The MZK-1 and MZK-2 Alternatives have 99.6 fewer acres of newly

fragmented woodlands than the CFT-1 and CFT-2 routes.

Q HOW DO YOU RESPOND TO MS. BURNS' STATEMENT THAT THE CFT ROUTE'S SHORTER LENGTH TRANSLATES INTO LESS ENVIRONMENTAL IMPACT?

A I disagree. First of all she does not state what she is referring to as environmental factors. Secondly, the measure of environmental factors in this proceeding has not been calculated by length. I believe that this is because shorter length does not always mean less environmental impact. In addition, I do not believe that Ms. Burns has made any supporting calculation or analysis. There are numerous routing factors that are presented in MCPO Exhibit 2.2(RH) which tabulate the number of features and area of features within the 500-foot analysis corridor. For the purpose of my testimony here "environmental impact" refers to the natural features in the environment such as deciduous forest, wooded areas, wetlands, open water, streams, lakes, protected species, rookeries, and natural areas.

Due to the disturbed nature of the land area associated with the MZK and CFT routes (i.e., land that has been altered through cultivation and development), the amount of land that is not already routinely disturbed by cultivation and development on each of these routes is very little. MCPO Exhibit 4.2(RH) tabulates the amount of land within each of the route alternatives that is not already routinely disturbed through cultivation and some form of development (i.e., minimally disturbed lands). A transmission line has the highest potential for impacting an intact and functioning natural feature when it is routed through the area of land that is minimally disturbed. Through a comparison of these routes, all of the MZK Alternatives affect few acres of minimally disturbed lands than CFT and ATXIA routes. So in summary, while none of the proposed routes have a significant impact on the natural feature environment due to

the degree of impact associated with the existing land cultivation in this region, the MZK routes perform slightly better than the CFT routes in relation to the impacts on minimally disturbed lands.

Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A Yes, it does.